

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE: THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
As representative of THE COMMONWEALTH  
OF PUERTO RICO, ET AL.

Debtors

Case No. 17-BK-3283 (LTS)

(Jointly Administered)  
PROMESA TITLE III

OPPOSITION TO OBJECTION TO CLAIM

TO THE HONORABLE COURT:

COMES NOW, DOWNTOWN DEVELOPMENT CORP (DDC) through the undersigned attorney and hereby enters its appearance and respectfully states and prays as follows:

1. On August 5, 2022, Debtor objected (Doc#:21741-4) the claim number 27270 filed on 05/27/2018 filed by DDC in the amount of \$38,385.19, arguing that as per the books and records of the Commonwealth, the asserted liabilities are associated with amounts that were outside of the approved contract, where no contract was in place or where the invoices were never received and therefore are not due and owed by the Commonwealth agency asserted.

2. DDC right to the payment of the rents claimed interest had been perfected since 05/27/2018 based on the Lease Agreement signed by Debtor on September 5<sup>th</sup>, 2014, as per contract number 2015-000127, filed at Volume 7, page 114 in the contract's registry of the Department of Transportation and Public Works of the Commonwealth of Puerto Rico (DTOP); as per the disbursement account E2632-299-0490000-081-1998. **See Exhibit 1 - Copy of Lease Agreement signed September 5<sup>th</sup>, 2014 with certification of filing.**

3. Claim 27270 was amended on September 2, 2022, to include the lease agreement contained in the Exhibit 1.

4. Also, Debtor has ample knowledge of the contract and the amount due, since as per letter of Agust 5, 2015, the then Secretary of the DTOP, Miguel A. Torres Díaz,

cancelled the contract effective September 15<sup>th</sup>, 2015 (**see Exhibit 2 - Copy of Letter of Lease Cancellation signed August 5<sup>th</sup>, 2015**), and the amount claimed is for rent due up to September 14, 2015.

WHEREFORE, it is respectfully prayed that this Honorable Court grant the Claim Number 27270 as amended, and deny Debtor's objection to Claim Number 27270.

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may, in its discretion, schedule a hearing.

I HEREBY CERTIFY: That on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of this filing to all parties in interest as per master address list.

In San Juan, Puerto Rico, this 2<sup>nd</sup> day of September, 2022.

/s/ Rosendo E. Miranda López,  
U.S.D.C. No. 219405  
Rosendo E. Miranda López, Esq.  
Attorney for DDC  
PO Box 192096  
San Juan, PR 00919-2096  
Tel.724-3393 Fax: 723-6774  
[r.miranda@rmirandalex.net](mailto:r.miranda@rmirandalex.net)